

Message

From: Kelsey, Rick [RKelsey@adem.alabama.gov]
Sent: 3/9/2018 2:17:44 PM
To: Thompson, Lisa [Thompson.Lisa@epa.gov]
CC: Cranford, Brandon [BRC@adem.alabama.gov]; McAfee, James [JMcAfee@adem.alabama.gov]; Kler, Denis [Kler.Denis@epa.gov]
Subject: RE: NSPS Subpart OOOOa Clarification Request

Thank you. I greatly appreciate your help.

Richard T. Kelsey, Chief
Agriculture/Gas Unit
Chemical Branch
Air Division
Alabama Department of Environmental Management
Post Office Box 301463
Montgomery, Alabama 36130-1463
(334) 271-7876
adem.alabama.gov
rkelsey@adem.alabama.gov



Mission: Assure for all citizens of the state a safe, healthful and productive environment

From: Thompson, Lisa [mailto:Thompson.Lisa@epa.gov]
Sent: Friday, March 09, 2018 8:16 AM
To: Kelsey, Rick <RKelsey@adem.alabama.gov>
Cc: Cranford, Brandon <BRC@adem.alabama.gov>; McAfee, James <JMcAfee@adem.alabama.gov>; Kler, Denis <Kler.Denis@epa.gov>
Subject: RE: NSPS Subpart OOOOa Clarification Request

Hi Rick –

Apologize for the delay. We're almost there, and you should be hearing from your EPA Region 4 contact, Denis Kler (copied here), shortly.

Thanks, and let me know if there's anything else I can assist with.
Lisa Thompson

From: Thompson, Lisa
Sent: Monday, March 5, 2018 3:15 PM
To: 'Kelsey, Rick' <RKelsey@adem.alabama.gov>
Cc: Cranford, Brandon <BRC@adem.alabama.gov>; McAfee, James <JMcAfee@adem.alabama.gov>; Hambrick, Amy <Hambrick.Amy@epa.gov>
Subject: RE: NSPS Subpart OOOOa Clarification Request

Hi Rick –

These answers are still being run up the chain here at EPA. Should hear something soon. Thanks for your patience.

Lisa

From: Kelsey, Rick [<mailto:RKelsey@adem.alabama.gov>]
Sent: Monday, March 5, 2018 2:51 PM
To: Thompson, Lisa <Thompson.Lisa@epa.gov>
Cc: Cranford, Brandon <BRC@adem.alabama.gov>; McAfee, James <JMcAfee@adem.alabama.gov>; Hambrick, Amy <Hambrick.Amy@epa.gov>
Subject: RE: NSPS Subpart OOOOa Clarification Request

Ms. Thomson,

I wanted to follow up with you after our phone conversation last week to discuss the email below in greater detail. During our conversation, it sounded as though you may be able to respond by the end of last week. We are currently working on an application determination that would be significantly helped with responses to the questions listed below. Thanks for your help in this matter. Should you have any questions, please let me know.

Richard T. Kelsey, Chief
Agriculture/Gas Unit
Chemical Branch
Air Division
Alabama Department of Environmental Management
Post Office Box 301463
Montgomery, Alabama 36130-1463
(334) 271-7876
adem.alabama.gov
rkelsey@adem.alabama.gov



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From: Kelsey, Rick
Sent: Friday, February 23, 2018 4:58 PM
To: 'hambrick.amy@epa.gov' <hambrick.amy@epa.gov>; 'thompson.lisa@epa.gov' <thompson.lisa@epa.gov>
Cc: Cranford, Brandon <BRC@adem.alabama.gov>; McAfee, James <JMcAfee@adem.alabama.gov>
Subject: NSPS Subpart OOOOa Clarification Request

Ms. Amy Hambrick and/or Ms. Lisa Thompson,

The ADEM Air Division recently received a request from the EPA regarding the specific sources in Alabama that are subject to the NSPS Subpart OOOOa, Standards of Performance for Crude Oil and Natural Gas facilities for which Construction, Modification or Reconstruction Commenced After September 18, 2015. To correctly determine the facility universe subject to this NSPS, we would appreciate some clarification concerning a few issues that relate to our Unit, particularly how this NSPS applies to the Coalbed Methane Industry.

1. **Servicing more than one well** - §60.5365a(c) states that "Each reciprocating compressor affected facility, which is a single reciprocating compressor. A reciprocating compressor located at a well site, or an adjacent well site and servicing more than one well site, is not an affected facility under this subpart."

Does this mean that a reciprocating compressor that services more than one well site is not an affected facility whether it is located on a well site or not? We are seeing different interpretations for this regulatory citation across the Coalbed Methane industry.

2. **Installation Date** - In determining applicability between NSPS Subpart OOOO and NSPS Subpart OOOOa, is the applicability date determined by the actual reciprocating compressor installation date or the engine installation date?

For example, if a reciprocating compressor and the engine that powers the reciprocating compressor were installed in 2012, (subject to NSPS, Subpart OOOO), and the engine that powers the reciprocating compressor was replaced in 2016, would the compressor remain subject to NSPS Subpart OOOO or are they now subject to NSPS Subpart OOOOa?

3. **Increase in horsepower** - In determining the applicability to the collection of fugitive emission components at a compressor station for the purpose of §60.5397a, it states that a modification to a compressor station occurs when *“(2) One or more compressors at a compressor station is replaced by one or more compressors of a greater total horsepower than the compressor(s) being replaced. When one or more compressors is replaced by one or more compressors of an equal or smaller total horsepower than the compressor(s) does not trigger a modification of the compressor station for the purpose of §60.5397a.”*

Does this refer to the engine that powers the compressor or the compressor only, since Subpart OOOOa never mentions engines? Compressors are typically rated for a max horsepower matched to a similar sized engine. If the compressor is rated at 1000 hp and the engine is 500 hp and they replace the engine with a 600 hp without changing the compressor, does that trigger a modification as defined by §60.5365a(j)?

I greatly appreciate any help/clarification that you can provide as we move forward with this NSPS regulation and the applicability towards the Coalbed Methane Industry. Should you have any questions regarding this request, please contact Brandon Cranford at 334-271-7893 or by email at brc@adem.alabama.gov or James McAfee at (334) 394-4388 or by email at jmcafee@adem.alabama.gov.

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Agriculture/Gas Unit
Chemical Branch
Air Division
Alabama Department of Environmental Management
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rkelsey@adem.alabama.gov



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